



October 20, 2011

The Honorable Julius Genachowski  
FCC Chairman  
445 Twelfth Street, S.W.  
Washington, DC 20554

Dear Chairman Genachowski:

I am submitting this correspondence as a concerned business owner of Integrated Services, Inc., a small company located in Northbrook, Illinois. My company provides long distance services for small to mid sized businesses across the United States.

We applaud your efforts to protect consumers from phone bill cramming. However, we also strongly believe that third-party billing services provide great value, and that these services must be preserved for the benefit of both businesses and consumers.

Millions of consumers each year are able to acquire a wide variety of services at competitive rates, with a billing option that does not require them to open an additional line of credit or manage yet another bill. In addition, thousands of businesses across the nation appreciate the benefits of third-party billing, including the ability to reduce administrative costs and consolidate charges for services onto a single bill.

As a result, my company has been able to offer our customers a flexible and hassle-free billing option that saves them time and money, which has helped us to remain competitive in an increasingly challenging market. Banning third-party billing would unnecessarily harm businesses like ours, as well as those we serve.

Please be advised that Integrated Services, Inc. supports the efforts of protecting consumers from cramming. However, we believe that this is best achieved through the implementation of reasonable measures, not through an outright ban of a service that is valued by millions of consumers.

Accordingly, as you consider applying the rules in your Notice for Proposed Rulemaking, we urge you to consider the financial impact that eliminating the third-party billing option would have across the nation.

Best regards,

Larry Gilleland  
President

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